

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
Caption in Compliance with D.N.J. LBR 9004-2(c) <b>WASSERMAN, JURISTA &amp; STOLZ, P.C.</b> 110 Allen Road Suite 304 Basking Ridge, New Jersey 07920 Phone: (973) 467-2700 Fax: (973) 467-8126 <i>Proposed Counsel for Debtor-in-Possession, Marburn Stores, Inc., d/b/a Marburn Curtains</i> <b>DANIEL M. STOLZ, ESQ.</b> <b>DONALD W. CLARKE, ESQ.</b>	
In Re:	Chapter 11
<b>MARBURN STORES, INC., d/b/a MARBURN CURTAINS,</b>	Case No. 15-14411
	Hearing Date:
Debtor-in-Possession.	Honorable TBD

**NOTICE OF MOTION FOR THE ENTRY OF INTERIM AND FINAL ORDERS  
AUTHORIZING THE USE OF CASH COLLATERAL, GRANTING ADEQUATE  
PROTECTION, GRANTING RELATED RELIEF AND  
SCHEDULING FINAL HEARING THEREON**

TO: Office of the U.S. Trustee  
One Newark Center  
Suite 2100  
Newark, NJ 07102

Internal Revenue Service  
District Director's Office  
Newark District Office  
955 S. Springfield Avenue  
Springfield, New Jersey 07081

Internal Revenue Service  
District Director  
One Newark Center  
Newark, New Jersey 07102

State of New Jersey  
Division of Taxation  
50 Barrack Street  
P. O. Box 269

Trenton, New Jersey 08695

INCLUDING: 20 LARGEST UNSECURED CREDITORS and ALL PARTIES LISTED ON  
CERTIFICATION OF SERVICE

**PLEASE TAKE NOTICE**, that on the date specified on the *Order Regarding Application for Expedited Consideration of First Day Matters* the undersigned, as proposed counsel for Debtor, shall move before the United States Bankruptcy Judge to be determined, United States Bankruptcy Court, King Federal Building, 50 Walnut Street, 3<sup>rd</sup> Floor, P.O. Box 3152, Newark, New Jersey 07102, seeking the entry of an Order authorizing the Debtor to use cash collateral, and for such other relief that is just and proper.

**PLEASE TAKE FURTHER NOTICE**, that the undersigned shall rely upon the Motion filed herewith in support of the relief sought.

**PLEASE TAKE FURTHER NOTICE**, that oral argument is not requested.

**PLEASE TAKE FURTHER NOTICE**, that no brief is being filed herewith since the legal basis upon which relief should be granted is set forth in the Motion.

**PLEASE TAKE FURTHER NOTICE**, that all objections must be in writing, filed with the Clerk of the United States Bankruptcy Court, King Federal Building, 50 Walnut Street, 3<sup>rd</sup> Floor, P.O. Box 1352, Newark, New Jersey 07102, and a copy thereof must simultaneously be served upon Wasserman, Jurista & Stolz, P.C., Attn: Donald W. Clarke, Esq., 110 Allen Road, Suite 304, Basking Ridge, New Jersey 07920.

[space intentionally left blank]

**PLEASE TAKE FURTHER NOTICE**, that in the absence of any objections, the relief requested hereunder may be granted without further notice.

Respectfully submitted,

**WASSERMAN, JURISTA & STOLZ, P.C.**  
*Proposed Counsel for Debtor-in-Possession,  
Marburn Stores, Inc., d/b/a Marburn Curtains*

*/s/Donald W. Clarke*

By: \_\_\_\_\_  
**DONALD W. CLARKE**

Date: March 13, 2015